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To: Don Robinson, Director Environmental Health and Safety
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From: Brian Fitzpatrick, Environmental Management Services Program Head

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RE: Shipping Materials Refrigerated with Dry Ice

The US state variation USG-01 in the IATA guidelines located on page 37 states transport of dangerous goods by air must be in accordance with United States Regulations (49 CFR parts 171-180) or the ICAO technical instructions as limited by 49 CFR 171.11. The requirements of 49 CFR 175 apply to all shipments offered for air transport to, from, or within the United States, including when the shipment is prepared in accordance with these (IATA) regulations. "

DOT regulations take precedence over IATA when materials are shipped within the United States.

49 CFR 174.10(a)(13)(i) states that Carbon Dioxide, solid (Dry Ice) is exempt when shipped in quantities not exceeding 2.3 kg (5.07 pounds) per package packed as prescribed by 173.217 of this subchapter and used as a refrigerant for the contents of the package. The package must be marked with the name of the contents being cooled, the net weight of the dry ice or an indication that the net weight is 2.3 kg (5.07 pounds) or less, and also marked "Carbon Dioxide, Solid" or "Dry Ice".

Our HazMat Shipping Program website has a section for Frequently Asked Questions. We should add a question and answer for this item.

Q. Are all shipments of Dry Ice regulated as hazardous materials?

A. No, shipments within the United States which utilize 5.07 pounds or less of Dry Ice as a refrigerant are exempt from hazardous materials shipping regulations. The person shipping the materials must use proper packaging and must mark the container with:

- The name of the contents being refrigerated;
- The amount of dry ice per package, or an indication that the net weight is less than 5.07 pounds; and
- The words "Dry Ice" or "Carbon Dioxide, Solid"